



*Rohaley and Son Automotive, Inc aka Rohaley and Son Automotive* is an Ohio corporation and maintains its office and principal place of business at 7481 Brenel Drive, Mentor, OH 44060. Upon information and belief, Chad M. Leonard is a citizen and resident of the State of Ohio. Upon information and belief, Chad M. Leonard Holdings, Inc. is an Ohio corporation and maintains its office and principal place of business at 7481 Brenel Drive, Mentor, OH 44060 (Ex. A, ¶¶1-3); Defendant is incorporated and has its principal place of business in the State of Connecticut; and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs (Ex. B, Mentor Police records with inventory provided by Chad M. Leonard).

3. A copy of all process, pleadings, and orders served upon Defendant, as well as a Proof of Service of written notice of this Notice of Removal to all adverse parties and a copy of same being filed with the clerk of the State court is being filed with this notice as required by 28 USC§1446 (a) and (d).

4. A Proof of Service of written notice of this Notice of Removal to all adverse parties is being filed with this Notice of Removal as required by 28 USC §1446(a) and (d).

s/ Kurt D. Meyer  
KURT D. MEYER (0087580)  
**GREGORY AND MEYER, P.C.**  
Attorneys for Defendant  
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(0084349)

Dated: December 7, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2018, I electronically filed the foregoing ***Notice of Removal Based on Diversity of Citizenship and this Certificate of Service*** with the Clerk of the Court using the ECF system which will send notification of such filing to the following: **Not applicable.**

I hereby further certify that I have mailed by United States Postal Service the foregoing ***Notice of Removal Based on Diversity of Citizenship and this Certificate of Service*** to the following non-ECF participants:

Harold Pollock Esq.  
**Harold Pollock Co. LPA**  
5900 Harper Road, Suite 107  
Solon, OH 44139  
esq@pollock-law.com

Clerk of the Court  
**Court of Common Pleas Lake County Ohio**  
25 N. Park Place  
Painesville, OH 44077

***Attorneys for Plaintiffs***

s/ Kurt D. Meyer  
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